

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,

Plaintiff,

v.

SEAN COMBS, DADDY'S HOUSE  
RECORDINGS INC., CE OPCO, LLC d/b/a  
COMBS GLOBAL f/k/a COMBS  
ENTERPRISES, LLC, BAD BOY  
ENTERTAINMENT HOLDINGS, INC., BAD  
BOY PRODUCTIONS HOLDINGS, INC., BAD  
BOY BOOKS HOLDINGS, INC., BAD BOY  
RECORDS LLC, BAD BOY ENTERTAINMENT  
LLC, BAD BOY PRODUCTIONS LLC,  
ORGANIZATIONAL DOES 1-10, INDIVIDUAL  
DOES 1-10, AND SHAWN CARTER,

Defendants.

Civil Action No. 1:24-cv-07975-AT

**DECLARATION OF ALEX SPIRO IN SUPPORT OF DEFENDANT SHAWN  
CARTER'S MOTION FOR SANCTIONS, DISMISSING THE COMPLAINT  
PURSUANT TO FED. R. CIV. P. 11**

I, Alex Spiro, swear under penalty of perjury, pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner at Quinn Emanuel Urquhart & Sullivan LLP, counsel to Defendant Shawn Carter in the above-captioned action. If called as a witness, I could and would testify competently to the information contained herein.

2. In December 2024, a representative of the New York Police Department informed us that MTV's permit request for a jumbotron for the September 7, 2000 Video Music Awards was denied by the City of New York.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the NBC News report on an interview that its reporters conducted with the anonymous Plaintiff in this case that was published on December 13, 2024 at 7:27 PM EST.

4. Attached hereto as **Exhibit 2** is a true and correct copy of a photograph copyrighted by Coleman-Rayner posted online showing Shawn Carter at Lotus Night Club the night of September 7, 2000.

5. Attached hereto as **Exhibit 3** is a true and correct copy of screenshots at time stamp 1:41 and 2:28 from publicly available video footage of the MTV Music Video Awards that aired on September 7, 2000 (posted on YouTube at <https://www.youtube.com/watch?v=tgmN-oF3vok>) showing the absence of a jumbotron located outside of the awards show.

6. Attached hereto as **Exhibit 4** is a true and correct copy of screenshots at time stamp 4:39 and 10:08 from publicly available video footage of the MTV Music Video Awards that aired on September 7, 2000 (posted on YouTube at <https://www.youtube.com/watch?v=tgmN-oF3vok>) showing the barriers surrounding limousines preventing the crowd from approaching occupants.

7. Attached hereto as **Exhibit 5** is a true and correct copy of screenshots at time stamp 0:07, 0:43, and 0:47 from publicly available video footage of the MTV Music Video Awards that aired on September 7, 2000 (posted on YouTube at <https://www.youtube.com/watch?v=9zTaeDum03w>) showing that limousines departed the vicinity of Radio City and were not parked outside during the show.

8. Attached hereto as **Exhibit 6** is a true and correct copy of relevant excerpts from a certified transcript of the October 3, 2024 interview of Attorney Anthony Buzbee on the Chris Hansen Show.

9. Attached hereto as **Exhibit 7** is a true and correct copy of relevant excerpts from a certified transcript of the October 1, 2024 press conference held by Attorney Anthony Buzbee in Houston, Texas.

10. Attached hereto as **Exhibit 8** is a true and correct copy of a photograph copyrighted by Henry McGee/Globe Photos, Inc. posted online showing Sean Combs and Jennifer Lopez at Twirl Night Club the night of September 7, 2000.

11. Attached hereto as **Exhibit 9** is a true and correct copy of a list of New York City Automated City Register Information System (ACRIS) search results for deed and other conveyance documents listing Sean Combs as a party.

12. Attached hereto as **Exhibit 10** is a true and correct copy a CNN report on an interview that its reporters conducted with the anonymous Plaintiff in another case brought by Attorney Anthony Buzbee against Sean Combs that was published on December 11, 2024 at 12:56 PM EST.

13. Attached hereto as **Exhibit 11** is a true and correct copy of a photograph showing the entrance of the property located at 813 Park Avenue, New York, NY 10021.

14. Attached hereto as **Exhibit 12** is a true and correct copy of excerpts from the transcript of the interview of Attorney Anthony Buzbee on *TMZ Presents: The Downfall of Diddy Inside the Freak-Offs* that aired on April 28, 2024.

15. Attached hereto as **Exhibit 13** is a true and correct copy of a deed record from Suffolk County generated through a Lexis Nexis search for real property records listing Sean Combs as a party.

16. Attached hereto as **Exhibit 14** is a true and correct copy of a photograph showing the entrance of the property located at 40 Hedges Banks Drive, East Hampton, New York 11937.

I declare under the penalty of perjury that the foregoing statements are true and correct.  
Executed in New York, New York on the 8<sup>th</sup> day of January 2025.

/s/ Alex Spiro

Alex Spiro